

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PRESIDENT DONALD J. TRUMP, 45th President
of the United States of America, in his individual
capacity,

Plaintiff,

v.

3:23-cv-06883- PGG

SIMON & SCHUSTER, INC., a New York
corporation, ROBERT WOODWARD p.k.a. BOB
WOODWARD, an individual, and PARAMOUNT
GLOBAL, a Delaware corporation, f/k/a Viacom
Inc., successor by merger to CBS Corporation, a
Pennsylvania corporation f/k/a Westinghouse
Electric Corporation,

Defendants.

**AMENDED RULE 7.1 DISCLOSURE STATEMENT FOR DEFENDANT
SIMON & SCHUSTER, LLC**

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure and Rule 7.1.1 of this
Court's Local Rules, Defendant Simon & Schuster, LLC hereby states that Simon & Schuster,
Inc. (the predecessor in interest of defendant Simon & Schuster, LLC) is a non-governmental
corporate party and that:

Simon & Schuster, LLC is indirectly wholly-owned by (i) certain of its and its affiliates'
directors, officers and employees and (ii) certain investment vehicles advised by Kohlberg
Kravis Roberts & Co. L.P., an indirect subsidiary of KKR & Co. Inc. (NYSE: KKR). No

publicly traded organization has economic ownership of 10% or more of Simon & Schuster, LLC.¹

Dated: November 15, 2023

DAVIS WRIGHT TREMAINE LLP

/s/ Elizabeth A. McNamara

Elizabeth A. McNamara
Linda J. Steinman
John M. Browning
Leena M. Charlton
1251 Avenue of the Americas, 21st Floor
New York, NY 10020
Phone: (212) 489-8230
Email: lizmcnamara@dwt.com
lindasteinman@dwt.com
jackbrowning@dwt.com
leenacharlton@dwt.com

Attorneys for Simon & Schuster LLC

¹ Defendant Simon & Schuster, LLC intends to move the Court promptly to amend the caption in this action to substitute its name for the former entity “Simon & Schuster, Inc.”